

BINGHAM

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February 26, 2009

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

Re: Pipeline Telecom, Inc. (Form 499 Filer ID 826653)
2008 CPNI Compliance Certification
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Pipeline Telecom, Inc., and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2008 CPNI Certification

Respectfully submitted,



Katie B. Besha

Counsel for Pipeline Telecom, Inc.

cc: Enforcement Bureau Telecommunications Consumers Division (2 copies)
Best Copy and Printing, Inc. (via e-mail)

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 16, 2009

Name of company(s) covered by this certification: Pipeline Telecom, Inc.

Form 499 Filer ID: 826653

Name of signatory: Lance Littlejohn

Title of signatory: CEO


I, Lance Littlejohn, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed


Lance Littlejohn, CEO
Pipeline Telecom, Inc.

PIPELINE TELECOM, INC.

STATEMENT OF CPNI COMPLIANCE PROCEDURES

Pipeline Telecom, Inc. (the "Company" or "Pipeline") has had a longstanding policy of protecting CPNI in a manner consistent with the FCC's policies to protect CPNI from disclosure or unauthorized use. Pipeline is a small company that provides only wholesale VoIP international termination to other carriers and offers no end user retail services.

Pipeline has consistently protected its customers' CPNI from unauthorized access, use and disclosure. Specifically, Pipeline utilizes the following operational procedures to protect its customers' CPNI:

- As permitted by the CPNI rules Pipeline uses CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of Pipeline, other users or other carriers from unlawful use; and (3) to provide any administrative services for the duration of a call.
- Pipeline does not currently conduct marketing using CPNI. Pipeline has no plans to commence the use of CPNI for marketing for the foreseeable future.
- Pipeline does not provide CPNI to any third parties. The sole exception is for law enforcement personnel pursuant to a court ordered search warrant;
- Pipeline has five employees, four of whom have access to CPNI. All four of these employees have been trained on the need to protect CPNI and are subject to discipline, including termination in the event they misuse CPNI;
- Employees are trained on the FCC's CPNI requirements and are required to review and sign statements that they understand the FCC requirements regarding CPNI;
- Pipeline provides online access to its wholesale customers, and always done so with procedures that require passwords to be provided prior to providing call detail information to its customers;
- Pipeline has had no breaches of CPNI protection, and has never received any complaints of breaches;
- Pipeline has not taken any actions against data brokers in the past year nor have any attempts to access Pipeline's customers' CPNI using "pretext" occurred.